

ORVILLE EUGENE BRADFORD  
203 A. Margrett Drive  
Glen Burnie, MD 21060

Plaintiff,

v.

LAWRENCE G. MACDONALD  
2203 Strathcona Rd. Rte-312  
Forest Hill, PE 0C0A2A0

Defendant,

and

JAMES PHILLIPS DBA  
Phillips Specialized Heavy Duty Hauling LTD.  
119 Edinburgh Dr.  
Moncton, NB E1E 2K8

Defendant.

\* \* \* \* \*

\* IN THE  
\* CIRCUIT COURT  
\* OF MARYLAND  
\* FOR BALTIMORE COUNTY  
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\*  
\* Case No.: 03-C-18-011288  
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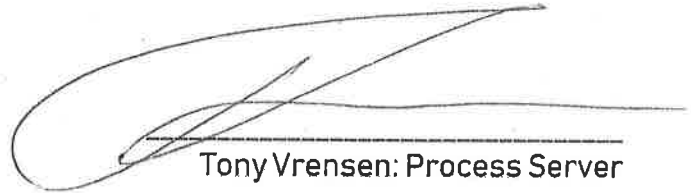
AFFIDAVIT OF SERVICE

I, TONY VRENSEN of the City of MONCTON, in the Province of New Brunswick, Country of CANADA, Process Server, MAKE OATH AND SAY AS FOLLOWS:

1. That I am an adult person and not a party to this Action.
2. That I did on Wednesday the 1<sup>st</sup> day of May, 2019 A.D. at 15:04, personally serve the above named Defendant, JAMES PHILLIPS DBA, Phillips Specialized Heavy Duty Hauling LTD., true copies of the original WRIT OF SUMMONS and AMENDED COMPLAINT, in this Action, copies of which are hereby attached and marked as Exhibits "A & B", to this my Affidavit of Service, by delivering the said copies to and leaving the same with JAMES PHILLIPS at the address provided for the Defendant being 119 Edinburgh Drive, Moncton, New Brunswick, Canada E1E 2K8.
3. That I was able to identify the above named Defendant by his verbal admission to me that he was James Phillips and was familiar with the proceedings contained in the documents and therefore the proper person to be served in this action.



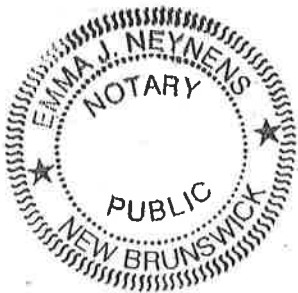
SWORN BEFORE ME at the CITY of  
MONCTON, this 2nd day of  
May 2019, A.D.



Tony Vrensen: Process Server



COMMISSIONER FOR OATHS AND  
NOTARY PUBLIC IN AND FOR  
THE PROVINCE OF NEW BRUNSWICK.  
CANADA (my appointment has no expiry)



**CIRCUIT COURT FOR BALTIMORE COUNTY,  
MARYLAND**

401 Bosley Avenue, P.O. Box 6734  
Towson, MD 21285-6734

Main: 410-887-2601  
Fax: 410-887-3234

To: JAMES PHILIPS  
DBA PHILLIPS SPECIALIZED HEAVY DUTY HAULING  
LTD.  
119 EDINBURGH DR  
MONCTON, NB E1E-2K8

Case Number: 03-C-18-011288  
Other Reference Number(s):

BRADFORD VS MACDONALD

Issue Date: 04/26/2019

**WRIT OF SUMMONS**

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by:

ORVILLE EUGENE BRADFORD  
203 A Margate Dr  
Glen Burnie, MD 21060

This summons is effective for service only if served within 60 days after the date it is issued.

*Julie L. Ensor*

Julie L. Ensor  
Clerk of the Circuit Court

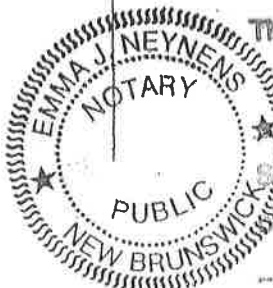
**To the person summoned:**

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

**Instructions for Service:**

1. This summons is effective for service only if served within 60 days after the date issued.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Maryland Rule 2-126.
4. If this notice is served by private process, process server shall file a separate affidavit as required by Maryland Rule 2-126(a).



This is Exhibit "A" referred to in the

Affidavit of

*Tony V. Vasa*  
Subscribed before me this *20th* day  
*May* 2019 A.D.  
*ED*

ORVILLE EUGENE BRADFORD  
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AMENDED COMPLAINT

Now comes the Plaintiff Orville E. Bradford, by Michael C. Eisenstein, his attorney and  
sues Lawrence MacDonald acting individually and as the agent, servant and/or employee of  
James Phillips, Defendants and states as follows:

1. For that on December 7, 2017, at approximately 4:35 P.M., the Plaintiff, Orville Bradford, was operating a vehicle going northbound on 1<sup>st</sup> Street, at its intersection with East Service Road, the said streets being public highways in Dundalk, Maryland.
2. When at the aforesaid time and place, a vehicle driven by the Defendant, Lawrence G. MacDonald, acting as the servant and/or employee of James Phillips, was traveling eastbound on East Service Road and was driving in an extremely reckless manner, and very violently struck

This is Exhibit <sup>(A)</sup> referred to in the

~~Affidavit of~~

Subscribed before me this 2nd day

AD



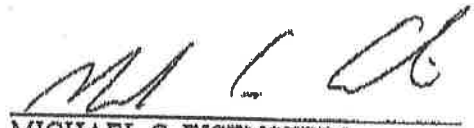
the side rear quarter panel of the vehicle which the Plaintiff was operating, whereby, Plaintiff was caused to be violently thrown about and caused extreme injuries from said collision.

3. That the aforesaid accident and collision was the direct result of the negligence of the Defendant, Lawrence G. MacDonald, in that he failed to stop at the light and avoid striking the vehicle which the Plaintiff was operating, that he struck the Plaintiff's vehicle in the side rear quarter panel, at a very high speed; that he was operating said vehicle in an extremely reckless manner; at a greater rate of speed than was prudent and reasonable under the circumstances then existing; that Defendant driver failed to avoid striking Plaintiff's vehicle in the side, when in the exercise of due care and caution the said collision should have been avoided; that Defendant driver operated said vehicle in an outrageously reckless manner; and said vehicle was negligently operated and controlled.

4. That as a result of the negligence of the Defendants, the Plaintiff was caused to suffer serious, painful and permanent injuries to his back, shoulder, elbow and knee, for which he was caused to seek, and continues to seek medical care and attention, and was unable to pursue his usual and customary means of employment, all to his great financial loss.

5. That the aforementioned accident and collision was caused solely by the negligence of the Defendants, without any negligence on the part of the Plaintiff, thereunto contributing.

**WHEREFORE** this suit is brought and Plaintiff Orville E. Bradford, claims Five-Hundred Thousand Dollars (\$500,000) in damages against Defendants Lawrence G. MacDonald and James Phillips.



MICHAEL C. EISENSTEIN

201 N. Charles Street Suite 1504

Baltimore, Maryland 21201

(410) 539-4446

*Attorney for Plaintiff*

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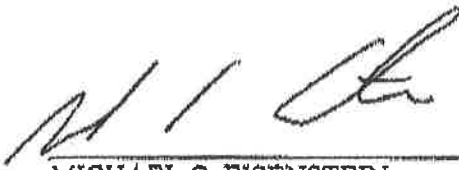
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REQUEST FOR JURY TRIAL

MR./M'S CLERK:

The Plaintiff respectfully requests a jury trial in this matter.

  
MICHAEL C. EISENSTEIN  
201 N. Charles Street  
Suite 1504  
Baltimore, Maryland 21201  
(410) 539-4446  
*Attorney for Plaintiff*